



**ACKNOWLEDGEMENT OF NOTIFICATION  
OF HAZARDOUS WASTE ACTIVITY  
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• NYD001315613

New York Times Co.  
229 West 43rd Street  
New York, N. Y. 10036

INSTALLATION ADDRESS

U.S. ENVIRONMENTAL PROTECTION AGENCY  
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

PLEASE PLACE LABEL IN THIS SPACE

Data  
base  
rec

## FOR OFFICIAL USE ONLY

## COMMENTS

## INSTALLATION'S EPA I.D. NUMBER

## APPROVED

DATE RECEIVED  
(yr., mo., & day)

55

F NYD0013/5613

T/A C

1

A

820308

## I. NAME OF INSTALLATION

NEW YORK TIMES CO

## II. INSTALLATION MAILING ADDRESS

## STREET OR P.O. BOX

3229 WEST 43 ST

## CITY OR TOWN

NEW YORK

## ST.

## ZIP CODE

NY 10036

## III. LOCATION OF INSTALLATION

## STREET OR ROUTE NUMBER

5229 WEST 43 ST

## CITY OR TOWN

NEW YORK

## ST.

## ZIP CODE

NY 10036

new York  
001 kn

## IV. INSTALLATION CONTACT

## NAME AND TITLE (last, first, &amp; job title)

2 FRIED GEORGE NEWSPRINT MGR

## PHONE NO. (area code &amp; no.)

212-552-1103

## V. OWNERSHIP

## A. NAME OF INSTALLATION'S LEGAL OWNER

8 NEW YORK TIMES CO

B. TYPE OF OWNERSHIP  
(enter the appropriate letter into box)F = FEDERAL  
M = NON-FEDERAL

M

## VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☐ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

## VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

## VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.



A. FIRST NOTIFICATION

☐ B. SUBSEQUENT NOTIFICATION (complete item C)

## C. INSTALLATION'S EPA I.D. NO.

## IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

	1		2		3		4		5		6	
	23 - 26		23 - 26		23 - 26		23 - 26		23 - 26		23 - 26	
	7		8		9		10		11		12	
	23 - 26		23 - 26		23 - 26		23 - 26		23 - 26		23 - 26	

13			14			15			16			17			18		
21	-	26	23	-	26	23	-	26	23	-	26	23	-	26	23	-	26
19			20			21			22			23			24		
23	-	26	23	-	26	23	-	26	23	-	26	23	-	26	23	-	26
25			26			27			28			29			30		
23	-	26	23	-	26	23	-	26	23	-	26	23	-	26	23	-	26

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

	49		50		51		52		53		54	
	23 - 26		23 - 26		23 - 26		23 - 26		23 - 26		23 - 26	

☐ 4. TOXIC  
(D000)

**SIGNATURE**

SIGNATURE

*George Fred*

NAME &amp; OFFICIAL TITLE (type or print)

NAME & OFFICIAL TITLE (type or print)  
GEORGE FRIED  
NEWS PRINT MGR

DATE SIGNED

3-8-82

**The New York Times**

229 WEST 43 STREET  
NEW YORK, N.Y. 10036

PERMITS AND COMPLIANCE  
BRANCH

Nov 7 2 51 PM '83

ENVIRONMENTAL PROTECTION  
AGENCY  
NEW YORK, N.Y. 10007

November 3, 1983

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. James Cleary,  
Environmental Engineer  
Solid Waste Branch  
U.S. Environmental Protection Agency, Region II  
26 Federal Plaza  
New York, N. Y. 10278

Re: New York Times Company  
N.Y., N.J.  
E.P.A.I.D. #NYD001315613

Dear Mr. Cleary:

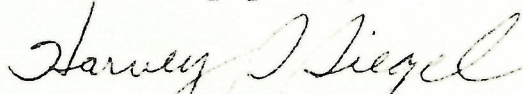
In answer to Dr. Regna's letter of October 19, 1983 please note the answers to the two questions proposed in Attachment I.

1. The Times operation at 43rd Street generates 25-30 drums of waste ink that is removed weekly.
2. Enclosed is a report from our consultant Atlantic Environmental Incorporated that should document to your satisfaction that the ink is nonhazardous.

Please send me a note indicating we had answered your questions.

Would you kindly remove our name and R.C.R.A.I.D. number from your list of employers who handle hazardous waste.

Sincerely yours,



Harvey S. Siegel, C.S.P., P.E.  
Safety Manager

HSS:MV



**ACKNOWLEDGEMENT OF NOTIFICATION  
OF  
HAZARDOUS WASTE ACTIVITY**

**09/08/2008**

Region 2

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

**EPA I.D. NUMBER: NYD001315613**

**INSTALLATION NAME: TIMES SQUARE BUILDING**

**INSTALLATION ADDRESS : 229 W 43RD ST 10TH FLOOR  
NEW YORK, NY 10036**

**MAILING ADDRESS : 229 W 43RD ST 10TH FLOOR  
NEW YORK, NY 10036**

EPA Form 8700-12AB (4-80)

**USEPA - REGION 2  
RCRA Programs Branch  
290 Broadway, 22nd Floor  
New York, NY 10007-1866**

**ATTN: RCRA NOTIFICATIONS  
Tel : (212) 637-4106  
Fax: (212) 637-4437**

**TO: TIMES SQUARE BUILDING  
or Current Occupant  
ATTN: PAZ KASPI  
229 W 43RD ST 10TH FLOOR  
NEW YORK, NY, 10036**



<b>SEND COMPLETED FORM TO:</b> The Appropriate State or EPA Regional Office.	United States Environmental Protection Agency <b>RCRA SUBTITLE C SITE IDENTIFICATION FORM</b>														
<b>1. Reason for Submittal</b> (See instructions on page 13.)  MARK ALL BOX(ES) THAT APPLY	<b>Reason for Submittal:</b> <input checked="" type="checkbox"/> To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities) <input type="checkbox"/> To provide Subsequent Notification of Regulated Waste Activity (to update site identification information) <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment #____) <input type="checkbox"/> As a component of the Hazardous Waste Report														
<b>2. Site EPA ID Number</b> (page 14)	<b>EPA ID Number</b> NYD001315613														
<b>3. Site Name</b> (page 14)	<b>Name:</b> Times Square Building														
<b>4. Site Location Information</b> (page 14)	<b>Street Address:</b> 229 W 43rd Street <b>City, Town, or Village:</b> New York <b>State:</b> NY <b>County Name:</b> New York <b>Zip Code:</b> 10036														
<b>5. Site Land Type</b> (page 14)	<b>Site Land Type:</b> <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other														
<b>6. North American Industry Classification System (NAICS) Code(s) for the Site</b> (page 14)	<table border="1"> <tr> <td data-bbox="375 1104 943 1178"> <b>A.</b>            5 3 1 3 1 2         </td> <td data-bbox="948 1104 1576 1178"> <b>B.</b>            5 3 1 1 2         </td> </tr> <tr> <td data-bbox="375 1184 943 1297"> <b>C.</b>            9 2 1 1 1         </td> <td data-bbox="948 1184 1576 1297"> <b>D.</b>            5 5 1 2 1         </td> </tr> </table>			<b>A.</b> 5 3 1 3 1 2	<b>B.</b> 5 3 1 1 2	<b>C.</b> 9 2 1 1 1	<b>D.</b> 5 5 1 2 1								
<b>A.</b> 5 3 1 3 1 2	<b>B.</b> 5 3 1 1 2														
<b>C.</b> 9 2 1 1 1	<b>D.</b> 5 5 1 2 1														
<b>7. Site Mailing Address</b> (page 15)	<b>Street or P. O. Box:</b> 229 W 43rd Street, 10th Floor <b>City, Town, or Village:</b> New York <b>State:</b> NY <b>Country:</b> USA <b>Zip Code:</b> 10036														
<b>8. Site Contact Person</b> (page 15)	<table border="1"> <tr> <td data-bbox="375 1535 943 1598"> <b>First Name:</b> Paz         </td> <td data-bbox="948 1535 1073 1598"> <b>MI:</b> </td> <td data-bbox="1078 1535 1576 1598"> <b>Last Name:</b> Kaspi         </td> </tr> <tr> <td colspan="2" data-bbox="375 1604 1073 1661"> <b>Phone Number:</b> 212 205 1400 <b>Extension:</b> </td> <td data-bbox="1078 1604 1576 1661"> <b>Email address:</b> paz@africaisrael.us         </td> </tr> </table>			<b>First Name:</b> Paz	<b>MI:</b>	<b>Last Name:</b> Kaspi	<b>Phone Number:</b> 212 205 1400 <b>Extension:</b>		<b>Email address:</b> paz@africaisrael.us						
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<b>Phone Number:</b> 212 205 1400 <b>Extension:</b>		<b>Email address:</b> paz@africaisrael.us													
<b>9. Operator and Legal Owner of the Site</b> (pages 15 and 16)	<table border="1"> <tr> <td colspan="2" data-bbox="375 1667 1073 1740"> <b>A. Name of Site's Operator:</b>            AFI USA         </td> <td data-bbox="1078 1667 1576 1740"> <b>Date Became Operator (mm/dd/yyyy):</b>            06/26/2008         </td> </tr> <tr> <td colspan="3" data-bbox="375 1747 1576 1789"> <b>Operator Type:</b> <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other         </td> </tr> <tr> <td colspan="2" data-bbox="375 1795 1073 1869"> <b>B. Name of Site's Legal Owner:</b>            AI 229 W 43 ST PROP Owners LLC         </td> <td data-bbox="1078 1795 1576 1869"> <b>Date Became Owner (mm/dd/yyyy):</b>            06/26/2008         </td> </tr> <tr> <td colspan="3" data-bbox="375 1875 1576 1923"> <b>Owner Type:</b> <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other         </td> </tr> </table>			<b>A. Name of Site's Operator:</b> AFI USA		<b>Date Became Operator (mm/dd/yyyy):</b> 06/26/2008	<b>Operator Type:</b> <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other			<b>B. Name of Site's Legal Owner:</b> AI 229 W 43 ST PROP Owners LLC		<b>Date Became Owner (mm/dd/yyyy):</b> 06/26/2008	<b>Owner Type:</b> <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
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<b>9. Legal Owner (Continued) Address</b>	Street or P. O. Box: 229 W 43rd Street, 10th Floor	
	City, Town, or Village: New York	
	State: NY	
	Country: USA	Zip Code: 10036

<b>10. Type of Regulated Waste Activity</b> Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 17 to 20.)																			
<b>A. Hazardous Waste Activities</b> Complete all parts for 1 through 6.																			
<b><input checked="" type="checkbox"/> <input type="checkbox"/> 1. Generator of Hazardous Waste</b> If "Yes", choose only one of the following - a, b, or c.  <input type="checkbox"/> a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.) of non-acute hazardous waste; or  <input checked="" type="checkbox"/> b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.) of non-acute hazardous waste; or  <input type="checkbox"/> c. CESQG: Less than 100 kg/mo (220 lbs./mo.) of non-acute hazardous waste  In addition, indicate other generator activities.  <input type="checkbox"/> <input checked="" type="checkbox"/> d. United States Importer of Hazardous Waste  <input type="checkbox"/> <input checked="" type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator	<b><input type="checkbox"/> <input checked="" type="checkbox"/> 2. Transporter of Hazardous Waste</b>  <input type="checkbox"/> <input checked="" type="checkbox"/> 3. Treater, Storer, or Disposer of Hazardous Waste (at your site) Note: A hazardous waste permit is required for this activity.  <input type="checkbox"/> <input checked="" type="checkbox"/> 4. Recycler of Hazardous Waste (at your site)  <input type="checkbox"/> <input checked="" type="checkbox"/> 5. Exempt Boiler and/or Industrial Furnace If "Yes", mark each that applies. <input type="checkbox"/> a. Small Quantity On-site Burner Exemption <input type="checkbox"/> b. Smelting, Melting, and Refining  <input type="checkbox"/> <input checked="" type="checkbox"/> 6. Underground Injection Control																		
<table border="0" style="width: 100%;"><tr><td style="width: 50%; vertical-align: top; padding: 5px;"><b>B. Universal Waste Activities</b>  <input type="checkbox"/> <input checked="" type="checkbox"/> 1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste that apply: <table style="width: 100%;"><tr><td></td><td style="text-align: center;"><u>Manage</u></td></tr><tr><td>a. Batteries</td><td style="text-align: center;"><input type="checkbox"/></td></tr><tr><td>b. Pesticides</td><td style="text-align: center;"><input type="checkbox"/></td></tr><tr><td>c. Mercury containing equipment</td><td style="text-align: center;"><input type="checkbox"/></td></tr><tr><td>d. Lamps</td><td style="text-align: center;"><input type="checkbox"/></td></tr><tr><td>e. Other (specify) _____</td><td style="text-align: center;"><input type="checkbox"/></td></tr><tr><td>f. Other (specify) _____</td><td style="text-align: center;"><input type="checkbox"/></td></tr><tr><td>g. Other (specify) _____</td><td style="text-align: center;"><input type="checkbox"/></td></tr></table> <input type="checkbox"/> <input checked="" type="checkbox"/> 2. Destination Facility for Universal Waste Note: A hazardous waste permit may be required for this activity.</td><td style="width: 50%; vertical-align: top; padding: 5px;"><b>C. Used Oil Activities</b> Mark all boxes that apply.  <input type="checkbox"/> <input checked="" type="checkbox"/> 1. Used Oil Transporter If "Yes", mark each that applies. <input type="checkbox"/> a. Transporter <input type="checkbox"/> b. Transfer Facility  <input type="checkbox"/> <input checked="" type="checkbox"/> 2. Used Oil Processor and/or Re-refiner If "Yes", mark each that applies. <input type="checkbox"/> a. Processor <input type="checkbox"/> b. Re-refiner  <input type="checkbox"/> <input checked="" type="checkbox"/> 3. Off-Specification Used Oil Burner  <input type="checkbox"/> <input checked="" type="checkbox"/> 4. Used Oil Fuel Marketer If "Yes", mark each that applies. <input type="checkbox"/> a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner <input type="checkbox"/> b. Marketer Who First Claims the Used Oil Meets the Specifications</td></tr></table>		<b>B. Universal Waste Activities</b>  <input type="checkbox"/> <input checked="" type="checkbox"/> 1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste that apply: <table style="width: 100%;"><tr><td></td><td style="text-align: center;"><u>Manage</u></td></tr><tr><td>a. Batteries</td><td style="text-align: center;"><input type="checkbox"/></td></tr><tr><td>b. Pesticides</td><td style="text-align: center;"><input type="checkbox"/></td></tr><tr><td>c. Mercury containing equipment</td><td style="text-align: center;"><input type="checkbox"/></td></tr><tr><td>d. Lamps</td><td style="text-align: center;"><input type="checkbox"/></td></tr><tr><td>e. Other (specify) _____</td><td style="text-align: center;"><input type="checkbox"/></td></tr><tr><td>f. Other (specify) _____</td><td style="text-align: center;"><input type="checkbox"/></td></tr><tr><td>g. Other (specify) _____</td><td style="text-align: center;"><input type="checkbox"/></td></tr></table> <input type="checkbox"/> <input checked="" type="checkbox"/> 2. Destination Facility for Universal Waste Note: A hazardous waste permit may be required for this activity.		<u>Manage</u>	a. Batteries	<input type="checkbox"/>	b. Pesticides	<input type="checkbox"/>	c. Mercury containing equipment	<input type="checkbox"/>	d. Lamps	<input type="checkbox"/>	e. Other (specify) _____	<input type="checkbox"/>	f. Other (specify) _____	<input type="checkbox"/>	g. Other (specify) _____	<input type="checkbox"/>	<b>C. Used Oil Activities</b> Mark all boxes that apply.  <input type="checkbox"/> <input checked="" type="checkbox"/> 1. Used Oil Transporter If "Yes", mark each that applies. <input type="checkbox"/> a. Transporter <input type="checkbox"/> b. Transfer Facility  <input type="checkbox"/> <input checked="" type="checkbox"/> 2. Used Oil Processor and/or Re-refiner If "Yes", mark each that applies. <input type="checkbox"/> a. Processor <input type="checkbox"/> b. Re-refiner  <input type="checkbox"/> <input checked="" type="checkbox"/> 3. Off-Specification Used Oil Burner  <input type="checkbox"/> <input checked="" type="checkbox"/> 4. Used Oil Fuel Marketer If "Yes", mark each that applies. <input type="checkbox"/> a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner <input type="checkbox"/> b. Marketer Who First Claims the Used Oil Meets the Specifications
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f. Other (specify) _____	<input type="checkbox"/>																		
g. Other (specify) _____	<input type="checkbox"/>																		

**11. Description of Hazardous Wastes (See instructions on page 21.)**

**A. Waste Codes for Federally Regulated Hazardous Wastes.** Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D008

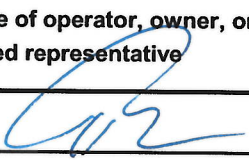
**B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes.** Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.

N/A

**12. Comments (See instructions on page 21.)**

**13. Certification.** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

For the RCRA Hazardous Waste Part A Permit Application, all operator(s) and owner(s) must sign (see 40 CFR 270.10 (b) and 270.11). (See instructions on page 21.)

Signature of operator, owner, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	Paz Kaspi, VP of Development	08/27/08

# RCRA Site Detail

Report run on: September 3, 2008 - 10:09 AM

Page 3

## NYD001315613 NEW YORK TIMES CO

EPA Region 02 Extract Flag: Y Facility Identifier: County: NEW YORK

Universes Generator: N Transporter: U Active: N  
Operating TSDF: ----- IC In Place: N EI Indicator (HE / GW): N / N

Activity Location: NY Source Type: Implementer Seq. Number: 2 Receive Date: 01 JAN 2007

Other/Previous Site Name: NEW YORK TIMES CO

Location 229 W 43RD ST  
Address: NEW YORK, NY 10036

Mailing 229 W 43RD ST  
Address: NEW YORK, NY 10036  
UNITED STATES

Contact Person GEORGE FRIED 229 W 43RD ST  
For Source (212) 556-1103 NEW YORK, NY 10036  
Information UNITED STATES

Owner (current) NOT REQUIRED Type: Private  
NEW YORK TIMES CO NOT REQUIRED, WY 99999  
From: To: NOT REQUIRED Phone: (212) 555-1212  
Notes: This record created to coincide with EPA Mass Update for 01/01/2007 on Rundate: 06/11/2008

Operator (current) NOT REQUIRED Type: Private  
NEW YORK TIMES CO NOT REQUIRED, WY 99999  
From: To: NOT REQUIRED Phone: (212) 555-1212  
Notes: This CP Indicator record created to coincide with EPA Mass Update for 01/01/2007 on Rundate: 06/11/2008...and HQ Criteria forcing at least one Current Operator to exist None existed to this update

Land Type: Bad code - Non Notifier: No Commercial Availability: Unknown Tsd Date:  
Accessibility: C No. Employees: State District: NYSDEC R2

Notes: EPA Universe Clean-Up for 01/01/2006, (Rundate: 05/08/2007), as per 2003/2004/2005 Acute/NonAcute Manifest data. Old Univ= N New Univ= N  
Update 10/03 to ensure Leg\_Dist is associated with correct Counties

### Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Not a Generator; State: NY-N Not a generator, Verified

Transfer Facility:

### Used Oil Activities

Other Hazardous Waste Generator Activities

Importer Activity: Unknown  
Mixed Waste Generator: Unknown

Transporter Activity: Unknown  
TSD Activity: Yes  
Recycler Activity: No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown  
Smelting, melting, Refining Furnace  
Exemption: Unknown

Used Oil Transporter Activity Off-Specification Used Oil Burner: No

Transporter: No  
Transfer Facility: No Used Oil Fuel Marketer Activity

Used Oil Processor and/or Re-refiner Activity Marketer who directs shipment off-specification used oil to off-specification used oil burner: No

Processor: No  
Refiner: No Marketer who first claims the used oil meets the specifications: No

Underground Injection Control: No Destination Facility for Universal Waste: Unknown

Activity Location: NY Source Type: Implementer Seq. Number: 1 Receive Date: 01 JAN 2006

Other/Previous Site Name: NEW YORK TIMES CO

Location 229 W 43RD ST  
Address: NEW YORK, NY 10036

Mailing 229 W 43RD ST  
Address: NEW YORK, NY 10036  
UNITED STATES

Contact Person GEORGE FRIED 229 W 43RD ST  
For Source (212) 556-1103 NEW YORK, NY 10036  
Information UNITED STATES

Land Type: Bad code - Non Notifier: No Commercial Availability: Unknown Tsd Date:  
Accessibility: C No. Employees: State District: NYSDEC R2

Notes: EPA Universe Clean-Up for 01/01/2006, (Rundate: 05/08/2007), as per 2003/2004/2005 Acute/NonAcute Manifest data. Old Univ= N New Univ= N  
Update 10/03 to ensure Leg\_Dist is associated with correct Counties

# RCRA Site Detail

Report run on: September 3, 2008 - 10:09 AM

Page 4

## NYD001315613 NEW YORK TIMES CO

Continued...

### Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Not a Generator; State: NY-N Not a generator, Verified

Transfer Facility:

### Used Oil Activities

Other Hazardous Waste Generator Activities

Used Oil Transporter Activity

Off-Specification Used Oil Burner:

No

Importer Activity: Unknown

Transporter: No

Used Oil Fuel Marketer Activity

Mixed Waste Generator: Unknown

Transfer Facility: No

Marketer who directs shipment  
off-specification used oil to  
off-specification used oil burner:

No

Transporter Activity: No

Used Oil Processor and/or  
Re-refiner Activity

TSD Activity: Yes

Processor: No

Marketer who first claims the used  
oil meets the specifications:

No

Recycler Activity: No

Refiner: No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown

Underground  
Injection Control:

No

Destination Facility for  
Universal Waste:

Unknown

Smelting, melting, Refining Furnace  
Exemption: Unknown

Activity Location: NY Source Type: Notification Seq. Number: 1 Receive Date: 08 MAR 1982

Other/Previous Site Name: NEW YORK TIMES CO

Location 229 W 43RD ST  
Address: NEW YORK, NY 10036

Mailing 229 W 43RD ST  
Address: NEW YORK, NY 10036

Contact Person GEORGE FRIED 229 W 43RD ST  
For Source (212) 556-1103 NEW YORK, NY 10036  
Information

Owner (current)

NOT REQUIRED  
NOT REQUIRED, WY 99999

Type: Private  
Phone: (212) 555-1212

NEW YORK TIMES CO  
From: To:

Land Type: Bad code - Non Notifier: No Commercial Availability: Other - U Tsd Date:  
Accessibility: No. Employees: State District: NYSDEC R2

Notes: Update 10/03 to ensure Leg\_Dist is associated with correct Counties

### Regulated Waste Activities

Hazardous Waste Generator Status - Federal: ; State: HQ-N Not a Generator

Transfer Facility: Unknown

### Used Oil Activities

Other Hazardous Waste Generator Activities

Used Oil Transporter Activity

Off-Specification Used Oil Burner:

No

Importer Activity: Unknown

Transporter: No

Used Oil Fuel Marketer Activity

Mixed Waste Generator: Unknown

Transfer Facility: No

Marketer who directs shipment  
off-specification used oil to  
off-specification used oil burner:

No

Transporter Activity: No

Used Oil Processor and/or  
Re-refiner Activity

TSD Activity: Yes

Processor: No

Marketer who first claims the used  
oil meets the specifications:

No

Recycler Activity: No

Refiner: No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown

Underground  
Injection Control:

No

Destination Facility for  
Universal Waste:

Smelting, melting, Refining Furnace  
Exemption: Unknown

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D001

\* End of Report \*

# REPORT OF ANALYSIS

October 1983

Type of Sample-Ink Sludge from Black News InkSource of Sample-New York Times, New York CityAnalysis: For Hazardous Waste Classification

Discussion: Atlantic Environmental obtained information from the New York Times regarding the ingredients of news ink and news ink sludge. In addition, the literature was reviewed regarding ingredients. Also, considerable experience in the news ink and printing ink industries was utilized in this evaluation.

Review of Contents

Performed by: Atlantic Environmental

<u>Review</u>	<u>Source</u>	<u>Results</u>
Hazardous Waste	RCRA Haz. Waste List	No listed wastes are ingredients
Acute Haz. Waste	RCRA Acute Haz. Waste	"
Non-Specific Wastes	RCRA 261.31 List	No waste streams describe ink sludge wastes
Specific Waste	RCRA 261.32 List	No waste streams describe ink sludge
REACTIVITY	RCRA 261.23	Non-reactive
IGNITABILITY	RCRA 261.21	SEE LAB ANALYSIS
CORROSITIVITY	RCRA 261.22	SEE LAB ANALYSIS
EP TOXICITY	RCRA 261.24	SEE LAB ANALYSIS

## REPORT OF ANALYSIS

October 1983

### WASTE ANALYSIS

The above review indicated a need to perform several tests to confirm the confirmation and content of the ink sludge.

The analysis was performed using the EPA 1982 criteria for analysis of wastes for hazardous ingredients.

<u>ANALYSIS</u>	<u>METHOD</u>	<u>RESULTS</u>
pH	pH meter	No pH
Flash Point	Pensky-Martin Covered Cup	Above 210°F

### EP TOXICITY

	EXTRACTION/AA	
ARSENIC		None detected (ND)
BARIUM	" /I-CAP	0.46mg/l
CADMIUM	" /AA	0.0045mg/l
CHROMIUM	" /AA	ND
LEAD	" /AA	0.070mg/l
MERCURY	" /AA	ND
SELENIUM	" /AA	ND
SILVER	" /AA	ND

### CONCLUSION

The above review and lab analysis indicates the news ink sludge sample is non-hazardous.



## Continental Technical Services

A Facility of The Continental Insurance Companies

THE ENVIRONMENTAL HEALTH LABORATORY  
of  
CONTINENTAL TECHNICAL SERVICES  
9742 SKILLMAN • DALLAS, TEXAS 75243 • 214/343-2025

LABORATORY REPORT 83-1287

83/10/21

ATLANTIC ENVIRONMENTAL, INC.  
112 MAIN ROAD  
MONTVILLE NJ 07045

Attn: BOB SHERIFF

EHL NO.	FIELD NO.	SAMPLE MEDIA	SAMPLE VOL.	ANALYSIS	RESULTS
D8192		BULK	--	RCRA	SEE ATTACHED

COMMENTS:

THANK YOU !  
*Roger Hallstein*  
ROGER HALLSTEIN, Ph.D.  
LABORATORY MANAGER

REF ID: A66440

EP TOXICITY EXTRACTION: YES

DESCRIPTION: BLACK INK SLUDGE

41

THE NEW YORK TIMES COMPANY

LEGAL DEPARTMENT  
229 WEST 43 STREET  
NEW YORK, N.Y. 10036

KATHARINE P. DARROW  
General Counsel

LAURA J. CORWIN  
TRUMAN W. EUSTIS III  
GEORGE FREEMAN  
CHARLES H. KAPLAN  
KENNETH A. RICHIERI  
DAVID A. THURM  
SOLOMON B. WATSON IV

SENDER'S DIRECT  
TELEPHONE NUMBER:  
212 5561760

January 10, 1985

Mr. John L. Middelkoop, P.E.  
Supervisor, Permits Section  
Bureau of Hazardous Waste Technology  
Division of Solid and Hazardous Waste  
New York State Department of  
Environmental Conservation  
50 Wolf Road, Room 207  
Albany, NY 12233

Re: The New York Times Company --  
EPA I.D. No. NYD001315613

Dear Mr. Middelkoop:

*OK  
WC:24  
FC 9  
5/16/85  
CD*

I am writing on behalf of The New York Times Company to request that you remove our name and EPA identification number from your list of employers who handle hazardous waste.

The Notification of Hazardous Waste Activity (a copy of which is enclosed) was filed in March 1982 by the Purchasing Department of The Times in the erroneous belief that the waste ink generated in the printing process at our 43d Street plant could not be removed unless an EPA identification number was obtained. Since our waste ink is not hazardous (see below), this assumption was incorrect. As indicated in the enclosed correspondence, The Times endeavored to get its name removed from the EPA list in 1983. Indeed, until being contacted recently by Mr. Jerome Reardon of your office, we believed that our name had in fact been removed from this list.

In support of The Times' request, I am enclosing, in addition to the above materials, a report from our independent consultant, Atlantic Environmental, and their laboratory, The Environmental Health Laboratory of Continental Technical Services indicating that the black news ink sludge generated at our 43d Street plant is not

hazardous. I am also enclosing a copy of 1983 correspondence between our then Safety Director Harvey Siegel and a Mr. Carlomagno of your office which reflects Mr. Carlomagno's agreement that since the ink is not hazardous, hazardous waste manifests are not warranted.

If you have any questions on this matter, please feel free to contact me. I would appreciate receiving a confirmation from you when our name and number have been removed from your list. Thank you very much for your consideration in this matter.

Very truly yours,

  
Kenneth A. Richieri

/sf  
Enclosures

cc: Richard A. Baker

bcc: Mr. Riggs  
Mr. Spina  
Mr. Fried



U.S. ENVIRONMENTAL PROTECTION AGENCY  
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

INSTALLATION'S EPA I.D. NO.
I. NAME OF INSTALLATION
II. INSTALLATION MAILING ADDRESS
III. LOCATION OF INSTALLATION

Attachment  
#1

BEL IN THIS SPACE

Data Base  
2000

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F N Y D 0 0 1 3 / 5 6 1 3	A	8 2 0 3 0 8

I. NAME OF INSTALLATION

NEW YORK TIMES CO

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX	
3 2 2 9 WEST 43 ST	
CITY OR TOWN	ST. ZIP CODE
NEW YORK	NY 10036

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER	
5 2 2 9 WEST 43 ST	
CITY OR TOWN	ST. ZIP CODE
NEW YORK	NY 10036

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
FRIED GEORGE NEWSPRINT MGR	212 656 1103

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER
NEW YORK TIMES CO

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F - FEDERAL  
M - NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

- ☐ A. GENERATION ☐ B. TRANSPORTATION (complete Item VII)  
☒ C. TREAT/STORE/DISPOSE ☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

- ☐ A. AIR ☐ B. RAIL ☐ C. HIGHWAY ☐ D. WATER ☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION

☐ B. SUBSEQUENT NOTIFICATION (complete Item C)

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

**A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23	23	23	23	23	23
7	8	9	10	11	12
20	20	20	20	20	20

13	14	15	16	17	18
23	23	23	23	23	23
24	20	21	22	23	24
25	26	27	28	29	30
25	26	27	28	29	30
25	26	27	28	29	30
25	26	27	28	29	30

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

49	50	51	52	53	54

☒ 1. FLAMMABLE (D000)      ☐ 2. CORROSIVE (D002)      ☐ 3. REACTIVE (D003)      ☐ 4. TOXIC (D000)

*I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

**SIGNATURE**

Signature George Fred

NAME &amp; OFFICIAL TITLE (type or print)

GEORGE FRIED  
NEWS PRINT MGR

DATE SIGNED \_\_\_\_\_

3-8-82



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II  
26 FEDERAL PLAZA

NEW YORK NEW YORK 10278

OCT 1 1981

*Attachment  
#2*

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Harvey Siegel  
Safety Coordinator  
New York Times Company  
229 West 43rd Street  
New York, New York 10036

Re: New York Times Company, New York, New York  
EPA I.D. Number NYD001315613

Dear Mr. Siegel:

The United States Environmental Protection Agency (EPA) regulates the handling of hazardous waste under the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6901 et seq.

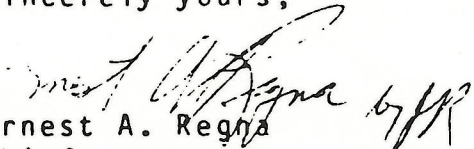
Section 3007 of RCRA, 42 U.S.C. §6927, allows EPA to request certain information from parties who handle or have handled hazardous waste. Pursuant to the provisions of this Section, we hereby require that you answer the questions posed and provide the information requested in Attachment I. Your reply should be completed and signed by a responsible official of your company, and must be returned within 20 calendar days of the date of this letter.

Your response to the request in Attachment I should be mailed within the date specified to Mr. James Cleary, Environmental Engineer, Solid Waste Branch, U.S. Environmental Protection Agency, Region II, 26 Federal Plaza, New York, New York 10278. Also, please send a copy of this response to Mr. Paul Zambratto, Permits Administration Branch, at the same address.

Your failure to respond to this letter truthfully and accurately within the time provided, may subject you to the initiation of an enforcement action under Section 3008 of RCRA, 42 U.S.C. §6928. Such enforcement action may include the assessment of substantial penalties of up to \$25,000 for continued non-compliance. This information request is not subject to the Paperwork Reduction Act of 1980, Title 44 of the United States Code.

If you have any questions about this letter, you may call Mr. James Cleary of my staff, at (212) 264-8929. Your cooperation is appreciated.

Sincerely yours,

  
Ernest A. Regha  
Chief  
Solid Waste Branch

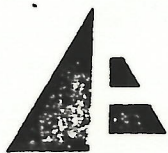
Enclosure

cc: Anna Saracco  
NYSDEC, Region 2 (w/encl.)

New York Times Company  
229 West 43rd Street  
New York, New York 10036

Attachment I

1. How much ink waste is generated each month at this site?
2. Please submit test data documenting that the ink waste generated at this site is nonhazardous. This should include a description of the analytic methods and procedures used.



ATLANTIC  
ENVIRONMENTAL

Attachment

#3

Page 1 of 2

## REPORT OF ANALYSIS

October 1983

Type of Sample-Ink Sludge from Black News Ink

Source of Sample-New York Times, New York City

Analysis: For Hazardous Waste Classification

Discussion: Atlantic Environmental obtained information from the New York Times regarding the ingredients of news ink and news ink sludge. In addition, the literature was reviewed regarding ingredients. Also, considerable experience in the news ink and printing ink industries was utilized in this evaluation.

### Review of Contents

Performed by: Atlantic Environmental

<u>Review</u>	<u>Source</u>	<u>Results</u>
Hazardous Waste	RCRA Haz. Waste List	No listed wastes are ingredients
Acute Haz. Waste	RCRA Acute Haz. Waste	"
Non-Specific Wastes	RCRA 261.31 List	No waste streams describe ink sludge wastes
Specific Waste	RCRA 261.32 List	No waste streams describe ink sludge
REACTIVITY	RCRA 261.23	Non-reactive
IGNITABILITY	RCRA 261.21	SEE LAB ANALYSIS
CORROSITIVITY	RCRA 261.22	SEE LAB ANALYSIS
EP TOXICITY	RCRA 261.24	SEE LAB ANALYSIS

# REPORT OF ANALYSIS

October 1983

## WASTE ANALYSIS

The above review indicated a need to perform several tests to confirm the confirmation and content of the ink sludge.

The analysis was performed using the EPA 1982 criteria for analysis of wastes for hazardous ingredients.

<u>ANALYSIS</u>	<u>METHOD</u>	<u>RESULTS</u>
pH	pH meter	No pH
Flash Point	Pensky-Martin Covered Cup	Above 210°F

## EP TOXICITY

	<u>EXTRACTION/AA</u>	
ARSENIC		None detected (ND)
BARIUM	" /I-CAP	0.46mg/l
CADMIUM	" /AA	0.0045mg/l
CHROMIUM	" /AA	ND
LEAD	" /AA	0.070mg/l
MERCURY	" /AA	ND
SELENIUM	" /AA	ND
SILVER	" /AA	ND

## CONCLUSION

The above review and lab analysis indicates the news ink sludge sample is non-hazardous.



**Continental Technical Services**  
A Facility of The Continental Insurance Companies.

THE ENVIRONMENTAL HEALTH LABORATORY  
of  
CONTINENTAL TECHNICAL SERVICES  
9742 SKILLMAN • DALLAS, TEXAS 75243 • 214/343-2025

LABORATORY REPORT 83-1287

83/10/21

ATLANTIC ENVIRONMENTAL, INC.  
112 MAIN ROAD  
MONTVILLE NJ 07045

Attn: BOB SHERIFF

EHL NO.	FIELD NO.	SAMPLE MEDIA	SAMPLE VOL.	ANALYSIS	RESULTS
D8192		BULK	--	RCRA	SEE ATTACHED

COMMENTS:

THANK YOU !

*Roger Hallstein*  
ROGER HALLSTEIN, Ph.D.  
LABORATORY MANAGER

REPORT #: 05-1201

DESCRIPTION: BLACK INK SLUDGE

[illegible]

**The New York Times**

229 WEST 43 STREET  
NEW YORK NY 10036

*attachment  
#4*

November 3, 1983

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. James Cleary,  
Environmental Engineer  
Solid Waste Branch  
U.S. Environmental Protection Agency, Region II  
26 Federal Plaza  
New York, N. Y. 10278

Re: New York Times Company  
N.Y., N.J.  
E.P.A.I.D. #NYD001315613

Dear Mr. Cleary:

In answer to Dr. Regna's letter of October 19, 1983 please note the answers to the two questions proposed in Attachment I.

1. The Times operation at 43rd Street generates 25-30 drums of waste ink that is removed weekly.
2. Enclosed is a report from our consultant Atlantic Environmental Incorporated that should document to your satisfaction that the ink is nonhazardous.

Please send me a note indicating we had answered your questions.

Would you kindly remove our name and R.C.R.A.I.D. number from your list of employers who handle hazardous waste.

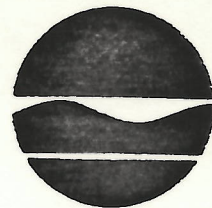
Sincerely yours,

*Harvey S. Siegel*

Harvey S. Siegel, C.S.P., P.E.  
Safety Manager

HSS:MV

New York State Department of Environmental Conservation  
50 Wolf Road, Albany, New York 12233-0001



Henry G. Williams  
Commissioner

*Attachment  
# 5*

August 4, 1983

Mr. Harvey Siegel  
Safety Manager  
New York Times  
229 West 43 Street  
New York, NY 10036

Dear Mr. Siegel:

As per our telephone conversation on August 4, 1983,  
I am enclosing a copy of our hazardous waste regulations  
(6NYCRR Part 365 and Part 366).

Also, I would like to confirm that if your waste is  
non-hazardous, you should not be using a New York State  
hazardous waste manifest or be submitting copies to us.

If you should have any questions on the regulations,  
please contact me at telephone number 518/457-6858.

Sincerely,

Salvatore J. Carlomagno, P.E.  
Senior Sanitary Engineer  
Division of Solid and Hazardous Waste

Enclosures

NYS Dept. of  
Environmental Conservation  
Div. of Hazardous Substances Regulation  
50 Wolf Road  
Albany, New York 12233

FAX No. (518)457-0629

PAB

91 MAY 23 PM 3:13

JANICE PLEASE  
INPUT THE FOLLOWING TO DF  
STATUS CHARGE ASAP

## FAX COVER SHEET

To: John Norman

Company Name: Environmental Protection Agency

Fax Number: (212) 264-7613

From: Mary Belcher (Robin - 7-9257)

Telephone Number 457-9361

Description: 2-page letter regarding  
"FY91 Preliminary Assessments."  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

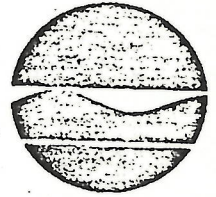
Number of pages (including cover): 3

Date sent: may 20, 1991 Time sent: \_\_\_\_\_

If there are any problems receiving this transmission please call:

Chris Halayko at (518)457-7750

New York State Department of Environmental Conservation  
50 Wolf Road, Albany, New York 12233



Thomas C. Jorling  
Commissioner

May 20, 1991

Mr. John Gorman  
Chief  
New York Compliance Section  
U.S. Environmental Protection Agency  
Region II  
26 Federal Plaza  
New York, NY 10278

RE: FY91 Preliminary Assessments

Dear Mr. Gorman:

As we discussed briefly on the telephone on May 20, 1991, the following is a partial list of the facilities that I received from Mr. Paul Counterman. The facilities included here are those that may not need assessments performed due to lack of TSDF activity.

<u>Site Name</u>	<u>City</u>	<u>Region</u>	<u>EPA I.D. Number</u>
Anchor Casting	Mattydale	II	NYD001617059
Monroe Plating	Rochester	VIII	NYD091662726 (TSDF=5)
New York Times	New York City	II	NYD001315613
Standard T Chem	Staten Island	II	NYD001601327 (TSDF=7)

Neither Monroe Plating and New York Times ever filed Part A according to our records. Both facilities are regarded as generators only and are identified as such on our manifest computer database.

Anchor Casting also never filed a Part A according to our files. They are not in our computer system as either a generator or a TSDF. We have an inspection report dated February 10, 1989 which verifies this. A copy will be forwarded to you.

Standard T Chem filed a Part A that was acknowledged by the EPA on January 15, 1981. The facility requested a change or status on November 10, 1983. A letter was sent out to them on August 22, 1984 terminating their interim status. Copies of the files that we have will be forwarded to you.

The remaining facilities of the original list that I was given are facilities that filed Part As and that we have some information about. We are tracking the following:

<u>Site Name</u>	<u>City</u>	<u>Region</u>	<u>EPA I.D. Number</u>
FMC c/o Diaz Chemical	Avon	VIII	NYD067532580
Mobil Chemical Corp.	Macedon	VIII	NYD012854048
Wilson Greatbatch	Clarence	IX	NYD058650102

No *NY* GMC Harrison Radiator Wastewater Plant in Lockport, New York, EPA Identification Number NYD980592901, did file a Part A. Our records are limited and we have not yet evaluated them for loss of interim status. Therefore, a site assessment would also be useful to us.

If you have any questions, please contact me at (518) 457-9361.

Sincerely yours,

*Gary Belcher*

Gary Belcher  
Regional Permit Section  
Bureau of Hazardous Waste Facility Compliance

cc: P. Counterman

GB:rsp  
(a:gorman.ltr)

New York Times Company  
229 West 43rd Street  
New York, New York 10036

Attachment I

1. How much ink waste is generated each month at this site?
2. Please submit test data documenting that the ink waste generated at this site is nonhazardous. This should include a description of the analytic methods and procedures used.

EP-44-1-15-100  
10001-10001-10001  
10001-10001-10001

PAB

RCRA INSPECTION FORM

Oct 13 2 14 PM '83  
ENVIRONMENTAL PROTECTION  
AGENCY  
NEW YORK, N.Y. 10007

Report Prepared for:

Generator ☐

Transporter ☐

HWM (TSD) facility ☒

Copy of report sent to the facility ☐

Facility Information

Name: NEW YORK TIMES CO.

Address: 229 WEST 43<sup>RD</sup> ST.  
NEW YORK, N.Y. 10036

EPA ID#: NYD001315613

Date of Inspection: SEPTEMBER 13, 1983

Participating Personnel

State or EPA Personnel: JAMES J. CLEARY


Facility Personnel: HARVEY SIEGEL  
FRANK CHIMENTO - ACT. GEN. FOREMAN

Report Prepared by Name: JAMES J. CLEARY

Agency: EPA

Telephone #: (212) 264-8929

Approved for the Director by:



Summary of FindingsFacility Description and Operations

COMPANY PRINTS ONE OF THE THREE MAJOR NEWSPAPERS SOLD IN NEW YORK CITY. THE COMPANY EMPLOYS APPROXIMATELY 400 PEOPLE IN THE PRESSROOM WHERE THE PAPER IS ACTUALLY PRINTED, & THE WASTE IS GENERATED. THERE ARE APPROXIMATELY 9 PRESSES IN THE PRESSROOM. THE FACILITY PRINTS THE PAPERS AT NIGHT & CLEANS THE PRESSES DURING THE DAY. THE COMPANY USES "HEXCEL" COMBINED WITH 4 OR 5 PARTS WATER TO CLEAN THE PRESSES. THEN, DEPENDING ON THE TYPE OF PRESS, THIS WASTE, ALONG WITH INK THAT LEANS FROM THE PRESSES, DRAINS TO A TROUGH IN A SUB-BASEMENT WHICH IN TURN DRAINS INTO 55 GAL DRUMS. ON OTHER PRESSES AIR VACUUMS ARE USED TO VACUUM THE WASTE INK FROM THE FOUNTAINS DIRECTLY INTO 55 GAL DRUMS. DRUMS ARE SHIPPED UNMANIFESTED TO SYN CHEMICAL IN NEW JERSEY WHERE THE INK IS THEN REPROCESSED.

Describe the activities that result in the generation of hazardous waste.

SEE PAGE -A-

Identify the hazardous waste located on-site, and estimate the approximate quantities of each. (Identify Waste Codes)

THERE WERE APPROXIMATELY 50 DRUMS OF WASTE IN IN THE  
STORAGE AREA OF THE SUB-BASEMENT

Is there reason to believe that the facility has hazardous waste on-site? *Yes*

- a. If yes, what leads you to believe it is hazardous waste?  
Check appropriate boxes:

- ☐ Company admits that its waste is hazardous during the inspection.
- ☒ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.
- ☐ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)
- ☐ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)
- ☐ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)
- ☐ Testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)
- ☐ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

GENERATOR INSPECTION CHECKLIST

40 CFR 262 Subpart A-General

262.11 - Hazardous waste determination

- 1) Did the generator test its waste to determine whether it is hazardous?

Is the waste hazardous? **NOT SURE**

- 2) Is the generator determining that its waste exhibits a hazardous waste characteristic(s) based on its knowledge of the material(s) or processes used?

YES NO N/A

✓ - DONE BY OTHERS

— — —

— — —

✓ - COMPANY CLAIMS WASTE NON-HAZ

— — —

40 CFR 262 Subpart B-The Manifest

Has hazardous waste been shipped off-site since November 19, 1980?

If yes, approximately how many shipments, off-site, have been made and describe the approximate size of an average shipment made on a monthly basis. If facility is a small quantity generator, please explain.

- 262.21 Does each manifest (or representative sample) have the following information? Please circle the missing elements.

- a manifest document number?
- the generators name, mailing address, telephone number and EPA I.D. Number?
- the transporters name and EPA I.D. Number?
- the name, address and EPA ID Number of the designated facility?
- a description of the wastes (DOT)?
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle?
- a certification that the materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?

(obtain a copy of the incomplete manifests)

— — — /  
— — — /  
— — — /  
— — — /  
— — — /  
— — — /  
— — — /

40 CFR 262 - Subpart D - Recordkeeping and Reporting

- 262.40 Has the generator maintained facility records since Nov. 19, 1980? (manifest, exception report and waste analysis)

- 262.42 Has the generator received signed copies (from the TSD facility) of all the manifests for waste shipped off-site more than 35 days ago?

If not, have Exception Reports been submitted to EPA covering any of these shipments made more than 45 days ago?

— — — ✓

— — — ✓

— — — ✓

YES NO N/A

40 CFR 262 - Subpart C - Pretransportation Requirements

262.30-33 Before transporting or offering hazardous waste for transportation off-site does the generator:

- 1) Package the waste in accordance with applicable DOT regulations (i.e., 49 CFR Parts 173, 178 & 179) \_ \_ \_
- 2) Label each package according to DOT (i.e., 49 CFR 172) \_ \_ \_
- 3) Mark each package according to DOT (i.e., 49 CFR 172) \_ \_ \_
- 4) Mark each container of 110 gallons or less with the words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. EPA." and include the generators name, address and manifest document number. (i.e., 49 CFR 172.304) \_ \_ \_

262.34 Accumulation Time

1) How is waste accumulated on-site?

- ☒ Containers
- ☐ Tanks
- ☐ Surface impoundments (complete EWMF checklist)
- ☐ Piles (complete EWMF checklist)

2) Is waste accumulated for more than 90 days? \_ ✓ \_

If yes, complete EWMF checklist

- 3) Is each container clearly dated with each period of accumulation so as to be visible for inspection? \_ \_ ✓
- 4) Is each container or tank marked or labeled with the words "hazardous waste" or in compliance with the DOT labeling requirements? \_ \_ ✓

UNABLE TO  
DETERMINE  
AT TIME OF  
INSPECTION

COMPANY  
CLAIMS WASTE  
IS NON-  
HAZ.

STOP HERE IF THE HAZARDOUS WASTE MGT FACILITY (TSD) CHECKLIST IS FILLED OUT

(For generators who accumulate waste in tanks or containers for 90 days or less)

40 CFR 265 - Subpart I Containers

YES    NO    N/A

265.170 - What type of containers are used for storage. Describe the size, type and quantity and nature of waste (e.g., 12 fifty-five gallon drums of waste acetone). 55 GAL DRUMS

265.171 - Do the containers appear to be in good condition, not in danger of leaking?

If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.

265.172 - Are hazardous waste stored in containers made of compatible materials?

If not, please explain.

SEVERAL CONTAINERS  
WERE OPEN & APPEARED  
TO BE 1/2 TO 3/4 FULL  
& WERE LOCATED  
IN THE STORAGE  
AREA

265.173(a) - Are all containers closed except those in use?

265.173(b) - Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking?

265.174 - Is the storage area inspected at least weekly?

265.176 - Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?

265.177 - Are incompatible wastes stored separate from each other?

40 CFR 265 Subpart J - Tanks

YES NO N/A

- 265.190 1) What are the approximate number and size of tanks containing hazardous waste? ✓  
 2) Identify the waste treated/stored in each tank.

265.192 - General Operating Requirements

- 1) Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks? ✓  
 If no, please explain.
- 2) Are there leaking tanks? ✓
- 3) Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures? ✓
- 4) Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure? ✓
- 5) If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank? e.g. bypass system to a standby tank ✓

265.194 - Inspections

- 1) Is the tank(s) inspected each operating day for  
 a) discharge control equipment  
 b) monitoring equipment  
 c) level of waste in tank ✓
- 2) Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures? ✓
- 3) Are there underground tanks? ✓  
 If yes, how many and can they be entered for inspection? ✓

- 265.198 - Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction? ✓  
 If no, please explain.

- 265.199 - Does it appear that incompatible wastes are being stored separate from each other? ✓

YES NO N/A

265.16 - Personnel Training

COMPANY  
CLAIMS WASTE  
IS NON-  
HAZ

- 1) Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed?

— ✓ —

If yes, have facility personnel taken part in an annual review of training?

— ✓ —

- 2) Is there written documentation of the following:

— job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?

— ✓ —

— type and amount of training to be given to personnel in jobs related to hazardous waste management?

— ✓ —

— actual training or experience received by personnel?

— ✓ —

- 3) Are training records kept on all employees for at least 3 years?

— ✓ —

40 CFR 265 - Subpart C - Preparedness and Prevention

265.32 Does the facility comply with preparedness and prevention requirements including maintaining:

— an internal communications or alarm system?

— ✓ —

— a telephone or other device to summon emergency assistance from local authorities?

— ✓ —

— portable fire equipment?

— ✓ —

— water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc.

— ✓ —

265.33 Is equipment tested and maintained?

— ✓ —

265.34 Is there immediate access to communications or alarm systems during handling of hazardous waste?

— ✓ —

265.35 Adequate aisle space?

— ✓ —

If no, please explain storage pattern.

In your opinion, do the types of waste on-site require all of the above procedures, or are some not needed: Explain.

— — —

40 CFR 265 - Subpart D - Contingency Plan and Emergency Procedures

Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions or any unplanned release of hazardous waste?

— ✓ —

1) Does the plan describe arrangements made with the local authorities?

— ✓ —

2) Has the contingency plan been submitted to the local authorities?

— ✓ —

3) Does the plan list names, addresses and phone numbers of Emergency Coordinators?

— ✓ —

4) Does the plan have a list of what emergency equipment is available?

— ✓ —

5) Is there a provision for evacuating facility personnel?

— ✓ —

6) Was there an emergency coordinator present or on call at the time of the inspection?

— ✓ —



FILE NO. \_\_\_\_\_  
NEW YORK OFFICE  
LOCKWOOD GREENE ENGINEERS, INC.

OCT 13 1982

RECEIVED

State of New Jersey  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF WASTE MANAGEMENT

JACK STANTON  
DIRECTOR

32 EAST HANOVER STREET  
TRENTON, N.J. 08625

October 13, 1982

LINO F. PEREIRA  
Deputy Director

Mr. D. G. Lovell  
Lockwood Greene Engineers, Inc.  
200 Park Avenue  
New York, NY 10166-0028

S. Klim

RE: Permitting Requirements for Proposed Incinerator

Dear Mr. Lovell:

The Division of Waste Management is in receipt of your letter of September 21, 1982 to Mr. David Schrier of our Technical Assistance Section containing the analysis of the on-site generated waste ink that is intended to be burned in the proposed on-site New York Times incinerator in Carlsdadt. The Division has determined that this waste ink is non-hazardous as per the September 21, 1982 analysis information.

Please be advised that the waste ink which conforms with the representative sample analyzed is classified as industrial waste (I.D. #27) pursuant to the rules on the New Jersey Hazardous Waste Regulations and that this determination expresses no opinion regarding any particular batch of waste ink to the extent that its characteristics and content differ from the representative sample analyzed. This response also does not constitute any representation as to the actual chemical composition of said material.

Since the proposed incinerator is not intended for burning hazardous waste, no permit is required for this incinerator from the Bureau of Hazardous Waste Engineering pursuant to N.J.A.C. 7:26-1 et seq. This determination is predicated on the fact that no hazardous waste will be, or is intended to be in the future, burned in the incinerator.

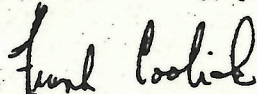
This letter also will not absolve the New York Times facility from securing necessary permitting as required under N.J.A.C. 7:27-8 et seq. covering requirements under Air Pollution Regulations. At the August 12, 1982 meeting in Trenton, BAPCO personnel were in attendance, and it is recalled that these regulations were given to you.

Copies of this letter are being sent to Mr. William O'Sullivan and Mr. William Hart of BAPCO so that they may be aware of the foregoing determination by this Bureau.

Please contact Mr. Walter Burshtin, Chief of the Bureau of Solid Waste Facility Review in order to ascertain whether a permit is required pursuant to the New Jersey Solid Waste Regulations. He can be reached at (609) 292-7019.

If you have any questions, please contact Mr. Robert Chinery of my staff at (609) 292-6363.

Very truly yours,



Frank Coolick, Chief  
Bureau of Hazardous Waste Engineering

FC:RC:ER:jb

cc Walt Burshtin  
William O'Sullivan  
William Hart  
Dave Schrier

Prod: Environmental Problems CR  
C General

MEMORANDUM for:

from: LEGAL DEPARTMENT

Kenneth A. Richieri

Harvey Siegel

⊕ Hazardous Waste  
⊕ N.Y. State Dept. of Env. Cons.

August 15, 1983

Re: Hazardous Waste Regulation

Mr. Carlomagno's letter is pretty clear that we do not have to use the Hazardous Waste Manifest if the waste ink is non-hazardous. I see nothing in the attached regulations which requires the use of a manifest for non-hazardous waste.

KAR  
K.A.R.

/sg  
Attachment

MEMORANDUM for:

Ken Richieri

from H. S. SIEGEL

August 10, 1983

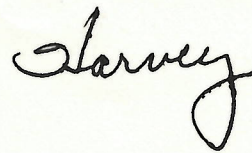
Re: Hazardous Waste Regulations

In accordance with the attached letter it is unnecessary for The New York Times to use the Hazard Waste Manifest (H.W.M.).

When I asked Salvatore Carlomagno, Senior Sanitary Engineer for the Division of Solid and Hazardous Waste of the New York State Department of Environmental Conservation, if we could alter the H.W.M. and call it Non-Hazardous Waste, he said don't use the form it will only confuse all the issues and result in additional problems for the State and The Times. He said that we could sufficiently cover ourselves with the properly marked shipping invoice that would indicate that the ink waste was non-hazardous. When I indicated we had made up the Non-Hazardous Waste decals, he said that was more than enough to identify the waste and the combination with the shipping invoice should more than satisfy the D.O.T.

Therefore the only action necessary is to have the Press Room personnel paste the decal on the ink waste drums and the Receiving Department properly mark the shipping invoice.

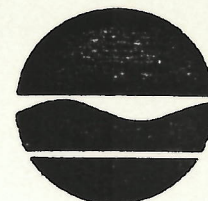
Would you kindly review the letter, DEC Publications, 6 NYCRR Part 365 & 366 (2 parts) so that we can finalize this procedure.



HSS:MV  
Enc..

cc: Mr. Bishow (w/o encl.)  
Mr. Chimento (w/o encl.)  
Mr. Fried (w/o encl.)  
Mr. Zucker (w/o encl.)

New York State Department of Environmental Conservation  
50 Wolf Road, Albany, New York 12233-0001



Henry G. Williams  
Commissioner

August 4, 1983

Mr. Harvey Siegel  
Safety Manager  
New York Times  
229 West 43 Street  
New York, NY 10036

Dear Mr. Siegel:

As per our telephone conversation on August 4, 1983,  
I am enclosing a copy of our hazardous waste regulations  
(6NYCRR Part 365 and Part 366).

Also, I would like to confirm that if your waste is  
non-hazardous, you should not be using a New York State  
hazardous waste manifest or be submitting copies to us.

If you should have any questions on the regulations,  
please contact me at telephone number 518/457-6858.

Sincerely,

Salvatore J. Carlomagno, P.E.  
Senior Sanitary Engineer  
Division of Solid and Hazardous Waste

Enclosures

**The New York Times**

229 WEST 43 STREET  
NEW YORK, N.Y. 10036

August 18, 1980

Dr. Ernest Regna  
Chief of Solid Waste Branch  
United States Environmental  
Protection Agency  
26 Federal Plaza  
New York, New York 10007

Dear Dr. Regna:

Thank you for your assistance in confirming my opinion  
that The New York Times did not have to file the "Notification  
of Hazardous Waste Activity" at this time.

It is the desire of The Times to comply with the letter and  
spirit of the law and conferring with a professional, such  
as yourself, makes that task much easier. I am sure that we will  
have additional contacts in the future and I hope that your  
office will keep us abreast of any developments that concern  
our industry.

Very truly yours,

*Harvey S. Siegel*

Harvey S. Siegel, C.S.P., P.E.

HSS/rom

Oct 17 1983  
PAID  
NEW YORK, N.Y. 10007  
ENVIRONMENTAL PROTECTION AGENCY

QPM 15 1983

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Harvey Siegel  
Safety Coordinator  
New York Times Company  
229 West 43rd Street  
New York, New York 10036

Re: New York Times Company, New York, New York  
EPA I.D. Number NY0001315613

Dear Mr. Siegel:

The United States Environmental Protection Agency (EPA) regulates the handling of hazardous waste under the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 56901 et seq.

Section 3007 of RCRA, 42 U.S.C. 56927, allows EPA to request certain information from parties who handle or have handled hazardous waste. Pursuant to the provisions of this Section, we hereby require that you answer the questions posed and provide the information requested in Attachment I. Your reply should be completed and signed by a responsible official of your company, and must be returned within 20 calendar days of the date of this letter.

Your response to the request in Attachment I should be mailed within the date specified to Mr. James Cleary, Environmental Engineer, Solid Waste Branch, U.S. Environmental Protection Agency, Region II, 26 Federal Plaza, New York, New York 10278. Also, please send a copy of this response to Mr. Paul Zambratto, Permits Administration Branch, at the same address.

Your failure to respond to this letter truthfully and accurately within the time provided, may subject you to the initiation of an enforcement action under Section 3008 of RCRA, 42 U.S.C. 56928. Such enforcement action may include the assessment of substantial penalties of up to \$25,000 for continued non-compliance. This information request is not subject to the Paperwork Reduction Act of 1980, Title 44 of the United States Code.

GH  
HMMMS  
10/28/83

hls

If you have any questions about this letter, you may call Mr. James Cleary of my staff, at (212) 264-8029. Your cooperation is appreciated.

Sincerely yours,

Ernest A. Regna  
Chief  
Solid Waste Branch

Enclosure

cc: Anna Seracco  
NYSDEC, Region 2 (w/encl.)

bcc: James Cleary, 2AMM-SM (w/encl.)  
Paul Zembratto, 2PM-PA (w/encl.) ✓